

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

UNITED STATES DEPARTMENT
OF AGRICULTURE,

PLAINTIFF

v.

NATALIE C. THEBERGE,

DEFENDANT

**CIVIL ACTION NO.:
1:25-cv-00140-LEW**

**PLAINTIFF'S MOTION TO STAY CASE AND TO EXTEND ALL
DEADLINES IN LIGHT OF LAPSE OF APPROPRIATIONS**

The United States Department of Agriculture (the “USDA”) hereby moves the Court to stay the above-captioned action and to extend all case deadlines to the earlier of thirty (30) days or ten (10) days after the Government Shutdown ends and appropriations are restored.

As grounds therefore, the USDA states as follows:

1. At the end of the day on September 30, 2025, the appropriations act that had been funding the USDA expired and those appropriations to the USDA lapsed. The USDA does not know when such funding will be restored by Congress.
2. The USDA is operating with only a skeletal staff until Congress appropriates funds for its operations.
3. As a result of the foregoing, undersigned Counsel for the USDA therefore requests a stay of the entire case until Congress has restored appropriations to the USDA.

4. If this motion for a stay is granted, undersigned Counsel will notify the Court as soon as Congress has appropriated funds for the USDA. The USDA may request that, at that point, all current deadlines for the parties be extended by the total number of days of the lapse in appropriations.

5. Undersigned Counsel sought concurrence of the Defendant regarding this request and has been informed that Defendant assents to the foregoing motion.

6. Therefore, while the USDA greatly regrets any disruption caused to the Court and to the Defendant, the USDA hereby respectfully moves the Court to stay the case and all pending deadlines to the earlier of thirty (30) days or ten (10) days after the Government Shutdown ends and appropriations are restored.

Dated October 10, 2025.

/s/ Kevin J. Crosman
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CERTIFICATE OF SERVICE

I certify that, on the date of the above Disclosures, the following parties were served electronically with a copy of the above Disclosures at the indicated e-mail address:

Thomas A. Cox, Esquire
Attorney for Defendant
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/s/ Kevin J. Crosman
Kevin J. Crosman, Esquire
Attorney for United States Department of
Agriculture